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24 MAY 2000

Mr. Phillip C. Harris
Division of Hazardous Waste Management
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0696-00

Dear Mr. Harris:

USE OF BUILDING 71 FOR REPACKAGING CONTAINERS OF HAZARDOUS WASTE

Reference: Letter, J. Craig and J. Bradburne to P. Harris, "Response to the Ohio Environmental Protection Agency Notice of Violation," dated November 29, 1999

In the above-referenced letter, the Fernald Environmental Management Project (FEMP) provided information on corrective actions taken to address violations cited by the Ohio Environmental Protection Agency (OEPA) for two leaking containers of hazardous waste. As part of these corrective actions, the FEMP proposed to establish an area within Tension Support Structure Number Six (TS-6) to repackage leaking and/or deteriorated containers of hazardous waste. This area would replace the existing area established in Building 71 for repackaging these containers.

Based on a further evaluation of the logistical support and engineering controls required for repackaging operations, it has been determined that Building 71 still provides the optimal location for these activities. Repackaging can be conducted in several enclosed areas located within Building 71 (Enclosure 1). High-Efficiency Particulate Air (HEPA) filtration units have been installed in each area to mitigate any emissions of airborne particulates generated from repackaging operations. Boundary air monitors are also present to ensure that the airborne radioactivity at the boundary remains at less than 10% of the Derived Airborne Concentration (DAC). The required support functions are already in place (i.e., change-out and work areas) and a radiological control point has been established, which electronically monitors access into the building.

Most of these components would have to be installed in TS-6 prior to initiating repackaging operations. Also, modifications might have to be made to the electrical system to provide the additional power needed to operate HEPA filtration units and air samplers. As a result, significant costs could be incurred in the establishment of this area in TS-6. The use of Building 71 would allow the FEMP to consolidate repackaging operations (for both low-level non-hazardous waste and hazardous waste) in one area. Since ignitable wastes can not be managed in TS-6, another location would have to be established for repackaging these containers. In addition, the area required for these operations would reduce the amount of space available in this unit for hazardous waste storage.

Repackaging operations are conducted within a secondary containment area constructed of Herculite diking. A second area has been set up in the northwest corner of Building 71 to stage containers, as necessary, prior to transport to the re-pack area. Herculite diking or individual spill control pallets/containments are also used in this area to provide secondary containment and to segregate incompatible containers of hazardous waste while they are being staged for repackaging. The underlying floor of Building 71 is in good condition and has been coated with an epoxy sealant.

Daily inspections are conducted of all containers of hazardous waste that are staged in these areas (Enclosure 2). The status of each leaking/deteriorated container is tracked until repackaging has been completed (Enclosure 3). Inventory reports identifying the date each container of hazardous waste was moved into Building 71 are reviewed on a weekly basis to ensure that these containers are returned to a Resource Conservation and Recovery Act (RCRA) storage unit in a timely manner (not to exceed ninety days). Information on the use of Building 71 as a repackaging area will be added to the FEMP's RCRA Part B Permit Application Update, which is scheduled for submittal to OEPA by May 31, 2000.

If you have any questions regarding this information, or require additional information, please contact John Sattler at (513) 648-3145.

Sincerely,

for Jack R. Craig
Director

FEMP:Sattler

Enclosures

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cc w/enclosures:
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosures:
J. Reising, OH/FEMP
J. Sattler, OH/FEMP
A. Tanner, OH/FEMP
J. W. Duling, Fluor Fernald, Inc./50
M. Kopp, Fluor Fernald, Inc./51
T. A. Poff, Fluor Fernald, Inc./65-2

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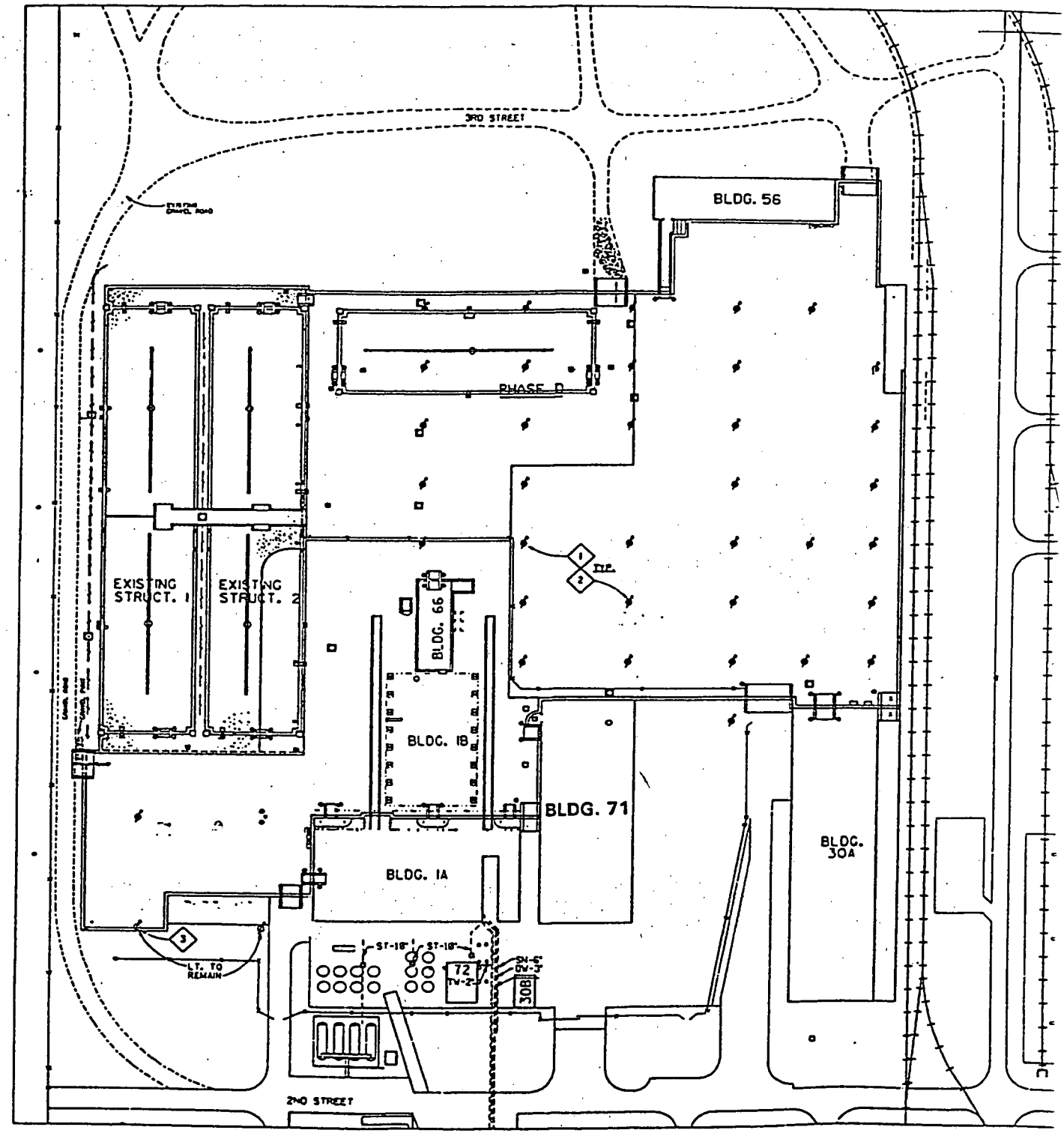
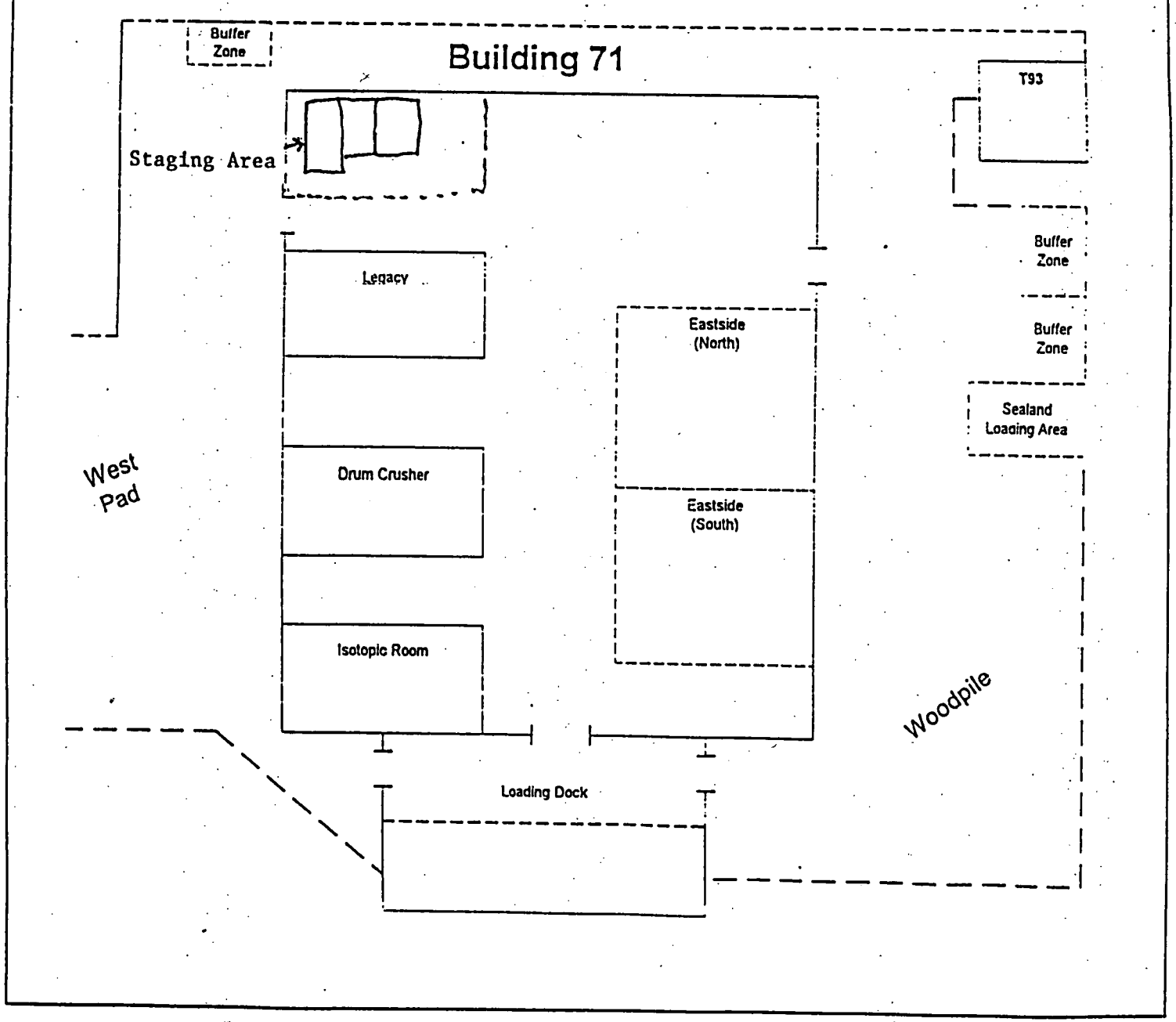
ENCLOSURE 1



PLANT 1 PAD AREA


Buffer Zone
Building 71
T93
Staging Area
Legacy
Buffer Zone
Eastside (North)
Buffer Zone
Sealand Loading Area
West Pad
Drum Crusher
Eastside (South)
Isotopic Room
Woodpile
Loading Dock

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ENCLOSURE 2

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FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location have been inspected.

Inspector (print)_____ Inspector's Signature _____ Badge No. _____ Date _____

Plant/Location _____ Supervisor's Signature _____ Badge No. _____ Date _____

AREA	INVENTORY NO.	ROW	STACK	LEVEL	CONT. COND. ACCEPTABLE YES	NO	NA	CONT. MGT. ACCEPTABLE YES	NO	INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	AEDO NOTIFIED Type I and II, Supervisors initials

Note 1: Type 1 leakers must be mitigated within 24 hours.
Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS:_____

Distribution: Transmit completed inspection forms to the Central Inspection Group.

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FS-F-4174
REV 3: 03/08/00, WM:STRG-T-0003

ENCLOSURE 3

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DAILY LEAKER REPORT

Date: _____
By: _____

Container No.	Date Found	Material Code	Container Type	Date Overpacked/ Repackaged	New Container No.